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FOR
ENVIRONMENTAL MANAGEMENT DEPARTMENT
ADMINISTRATIVE PROCEDURES MANUAL

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NOT RELATED TO PLANT SAFETY

Category 1
EFFECTIVE: 3/13/92

Approved By:

Director, Environmental Management — Date 2/28/92

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1 PURPOSE

This procedure establishes requirements for records used by the Environmental Management (EM) Department that result from the implementation of the EM Quality Assurance Program Description (EM-QAPD). Implementation of this procedure ensures that records are legible, identifiable, traceable, and retrievable.

2 SCOPE

This procedure applies to records that furnish documentary evidence of quality. This procedure does not address detailed activities performed by records center personnel.

Examples of QA records may include raw data, data quality records, auditing records, procurement documents, magnetic media, and other records as directed by the EM Department QA Program Manager (QAPM).

The requirements specified in this procedure apply only to the records system operated by the EM Department and do not apply to working files maintained by other organizations or individuals. However, the requirements for maintenance and protection of QA Records prior to transmission to the EM records center do apply.

3 TERMS/DEFINITION

3.1 **Authentication** - The process by which the originator attests that the QA Record is true and complete.

3.2 **EM Department QAPD** - Environmental Management Department *Quality Assurance Program Description*.

3.3 **EM Department Record Center** - The records center maintained by the Resource and Information Management Division (RIMD).

3.4 **EMDRT Form** — EM Department Records Transmittal form (see Appendix 1).

3.5 **Nonvisual Media** - Media that cannot be examined by visual inspection. Examples of visual media are

hardcopy documents and drawings. Examples of nonvisual media are magnetic tape and Bernoulli disks.

3.6 **QA Record** - A record that has been completed and authenticated by all required signatures and that furnishes evidence of the quality of data, items, or activities. QA records may include: (1) records prepared and maintained to demonstrate implementation of QA programs; (2) procurement records that document quality; (3) work plans; (4) materials that provide data and record quality regardless of the physical form or characteristics. A QA Record may be an individual record, a records package segment, or a records package.

3.7 **Records Custodian** - The responsible individual receiving, accepting, and managing QA Records.

3.8 **Records Package** - A QA record or group of QA records and their transmittal form(s) maintained within a single file unit because of the related nature of the records.

3.9 **Records Package Identifier** - An identifier by which the records source may request retrieval of the record (e.g., Sample Number for Field Data Packages, Nonconformance Report Number).

3.10 **Records Source** - The individual, typically the generator, who submits records to the EM records center.

3.11 **Record Package Segments** - Individual or sets of QA records that comprise a Records Package.

4 RESPONSIBILITIES

4.1 The EM Department Director is responsible for assigning the organization responsible for managing records. The EM Department's RIMD has been assigned this responsibility.

4.2 The QAPM is responsible for ensuring that the identification of quality records within program plans, procedures, and other documents that affect quality are specified.

4.3 The RIMD Manager is responsible for appointing an EM Department Records Custodian, establishing an organization capable of implementing the requirements of this procedure, and operating the EM Department records center.

4.4 The Records Source or responsible manager is responsible for correcting and authenticating records.

4.5 The Records Custodian is responsible for receiving, filing, maintaining, and preserving records affecting quality after their transfer to the EM records center.

4.6 All EM personnel are responsible for maintaining, protecting, and submitting QA records consistent with this procedure.

5 INSTRUCTION

5.1 Submission of Records

5.1.1 Except as noted elsewhere in this procedure, all QA Records shall be submitted to the EM Department Records Custodian.

5.1.2 The Records Source shall assemble records for submittal.

5.1.3 The Records Source shall inspect records for legibility and shall prepare a Records Transmittal Form (Appendix 1).

NOTE
Records will be inspected upon receipt. Criteria for QA Records are specified in Appendix 2.

5.1.4 If the record being submitted to the Records Custodian is not legible or complete, the Records Source shall correct the copy as described in this procedure or prepare a Best Available Copy form (Appendix 3).

5.1.5 The Records Source shall authenticate the record by date and signature prior to submittal to the records center.

5.1.6 The Records Source shall transmit the original and one copy of the record or record package segment to the Records Custodian within twenty (20) working days after completion. This transmission shall be made using the Records Transmittal form. The Records Source should retain a copy until receipt acknowledgement is obtained from the Records Custodian.

5.1.7 Transmitted documents shall be enclosed in a sealed container (i.e., envelope, box) to prevent loss of or damage to the documents.

5.2 **Records Receipt**

5.2.1 The Records Custodian shall inspect records for compliance with the criteria of Appendix 2.

5.2.2 If records do not meet the criteria of Appendix 2, the Records Custodian shall hold the record and notify the Record Source using the deficiency form of Appendix 5. An explanation of the deficiency shall be indicated on the deficiency form. If a deficiency form is received, the Records Source shall correct the copy or prepare a Best Available Copy form within ten (10) working days of receipt.

5.2.3 The Records Custodian shall accept the records and return a signed copy of the Records Transmittal form as receipt acknowledgement.

5.3 **Records Packages**

5.3.1 If a set of several documents would be more appropriately defined as a single record, a records package may be established for this set of documents. Typically, a records package is not kept open for more than 3 months. An example

package would be a set of data sheets from an activity that occurs over more than twenty (20) working days.

5.3.2 When initially opening a package to which segments will be added over a period of time, the Records Source shall provide the Records Custodian with a projected completion date and Table of Contents for the package. See Appendix 4 for an example of a record package Table of Contents.

5.3.3 The Records Custodian shall assign a records package number and provide that information to the Records Source.

5.3.4 When submitting subsequent records package segments, the Record Source shall record the records package number on the transmittal form.

5.3.5 The Records Source shall notify the Records Custodian, in writing, upon completion of the package. This notification may be made by indicating on the last segment transmitted that the package is now complete. If the notification is written on the last segment transmitted, this information should be highlighted by underlining, bolding, or other mechanism.

5.3.6 The Records Custodian shall prepare the final Table of Contents for the package (see Appendix 4). The Table of Contents shall be submitted to the Records Source for verification. The Table of Contents is a QA Record and requires authentication by the Records Source.

5.4 **Corrections to Records Prior to Submission**

5.4.1 The author(s) or responsible Division Manager may make corrections to records that have not yet been processed to the EM Department records center.

5.4.2 Erasures, correction fluid, or correction tape of any type shall not be used as a means of correcting information on QA Records.

5.4.3 Corrections shall be made by scribing a single line through the incorrect information using an indelible medium, preferably black ink, and entering the correct information in close proximity to the line-out.

5.4.4 The incorrect information shall remain legible. The correction shall include the date and initials or signature of the person making corrections.

5.5 **Record Enhancement**

Enhancement of unclear records is permissible to improve legibility, provided that the information contained within the record is in no way altered.

5.6 **Corrections to Submitted Records**

The responsible manager may correct a record that has already been submitted to the Records Custodian, or may submit a revised record to the Records Custodian.

5.7 **Lost or Damaged Records**

5.7.1 Loss or damage of QA Records requires written notification to the QAPM.

5.7.2 Replacement or repair of lost or damaged records is required where possible. Best available copies may be used.

5.8 **Special Records**

NOTE
This requirement may be modified as needed to comply with applicable security regulations.

5.8.1 Special records (e.g., photographs, negatives, microfilm, magnetic materials, etc.) that cannot be microfilmed or optically scanned but can be

copied shall be copied. The original record and one or two copies, shall be submitted to the Records Custodian.

5.8.2 Records on nonvisual media may be transferred to new media as technology evolves.

5.8.3 Nonvisual media must be verified prior to submittal or after transfer to new media. This may be achieved using automated write verification (write with verify) methods.

5.8.4 Procedures for recovery of nonvisual media shall be approved prior to submittal of such media. The procedure shall be independently verified annually by actual recovery of data from QA Records using that media.

5.8.5 Nonvisual media QA Records shall be accompanied by a Records Transmittal form (Appendix 1), and shall be labeled externally to uniquely identify the associated records.

5.9 **One-of-a-Kind Records**

5.9.1 Records that cannot be copied, microfilmed, or optically scanned, or would lose their meaning when microfilmed, such as radiographs, shall be submitted to the Records Custodian using a Records Transmittal form that clearly identifies the record as a "One-of-a-Kind" record.

5.9.2 The Records Custodian shall provide appropriate maintenance conditions for One-of-a-Kind records.

5.10 **Retention**

5.10.1 Records shall be retained as specified in the EM Department QAPD.

5.10.2 These records may be offered to the National Archive for permanent storage by the Records Custodian through the RFP Records Management Department. However, records shall not be discarded, destroyed, or otherwise dispositioned

in a manner that renders them difficult to retrieve, unless such disposition is authorized in writing by the EM Department Director. The Director should solicit advice from appropriate members of his staff and the RFP records management department prior to such authorization.

5.11 **Retrieval**

NOTE
Requests for classified records, unclassified nuclear information, confidential, or sensitive records shall not be honored unless access is authorized. Other environmental records are publicly accessible.

5.11.1 Records retrieval may be initiated by submitting a completed Retrieval form (Appendix 6) or through a verbal request to the EM records center.

5.11.2 The EM records center staff shall locate the requested record and make the required copies. (See step 0.1.5 regarding One-of-a-Kind records.)

5.11.3 The Records Custodian shall send copies of the requested records to the requestor. The copied records should be labeled as copies.

5.11.4 The requestor shall **not** retransmit these copies to the EM records center. They may be discarded when no longer useful.

5.11.5 One-of-a-kind records may be reviewed by the requestor in the EM records center, or the Records Custodian may formally transfer custody to the requestor.

6 RECORDS

The following QA records are generated by this procedure:

1. Records Transmittal form
2. Record Rejection form
3. Best Available Copy form
4. Records Package Table of Contents

7 REFERENCES

7.1 Environmental Management Department *Quality Assurance Program Description*

7.2 EG&G Site Quality Assurance Manual, "Quality Assurance Records," QR-17.

APPENDIX 1
RECORDS TRANSMITTAL FORM

EGⅇG ROCKY FLATS
ENVIRONMENTAL MANAGEMENT DEPARTMENT

EMD
RECORDS TRANSMITTAL

Page 1 of ____

RT – _____ '

This transmittal must be authenticated.

Records Package Segment? ☐ Yes ☐ No If yes, Records Package Number _____

Package Information:

File Number

Records Type:

QA Yes ____ No ____

Standard ____, Revision to Record ____, One-of-a-Kind ____,

Non-Standard Record (circle type) _____:

Photographs Negatives Microfilm Magnetic Material Oversized Document

Other (specify) _____

Classification: None _____, Unclassified Nuclear Information _____, Secret _____,

Confidential _____, Sensitive _____

Key Words: _____

Authenticated by: _____ (NAME) Signature: _____ Org. No: _____ Date: _____

Received by EM Records Custodian': Signature _____ Date: _____

' Completed by EM records center.

APPENDIX 1 (CONTINUED)
RECORDS TRANSMITTAL FORM (Second and Continuation Page)

EG&G ROCKY FLATS
ENVIRONMENTAL MANAGEMENT DEPARTMENT

EMD
RECORDS TRANSMITTAL
(Continuation Sheet)

Page ____ of ____
RT – _____ [1]

This transmittal must be signed (authenticated) by authorized personnel.

Document/Package Type (Title, Date, Document Number if available)	Author or Originator	Number of Pages	Accession Number [1]

[1] Completed by EM records center.

APPENDIX 2

EM DEPARTMENT CRITERIA FOR ACCEPTANCE OF SOURCE RECORDS FOR PROCESSING AND MICROFILMING

Part 1 -- General Criteria

Record includes:

1. Record date.

2. Record title or subject line.

3. Record recipient name, title, and organization.

4. Record author or Records Source name, title, organizations.

5. Record EM file number; RFP file index identified.

6. Record identification: identifies draft, information copy, secret, confidential, and Unclassified Nuclear Information (UCNI) records through the use of a stamp or other visible means on the face of the record.

7. Blocks and lines on forms filled in appropriately or "NA" entered for not applicable. Do not use "NA" for not available.

8. QA records authentication (signature) and date or stamp, initials, and date. This may also take the form of a statement by the individual or organization. Handwritten signatures are not required if the document is clearly identified as a statement by the reporting individual or organization. Reproduced copies are acceptable.

9. Appendices or enclosures submitted to the Records Custodian with individual QA records. One complete copy of an appendix or enclosure is placed into a record package when it has been used more than once with package materials. Example: A distribution of a letter with an enclosure is sent to ten individuals. One copy of the enclosure and one copy of each letter should be sent to the Records Custodian as a single item.

Record shall not include:

1. Obliterated text.

2. Erasure marks.

3. Unrelated and/or unofficial annotations.

4. Noncompliant changes or enhancements to the records.

Part 2 -- Microfilming Criteria (May not be applicable to Special Processed Records)

A. Purpose--The purpose of these criteria is to ensure that the microfilm record copy of EM Department QA records is of a quality sufficient for archiving.

B. Scope--These criteria apply to all records submitted to the records system for microfilming and retention, except for one-of-a-kind items defined as "records that cannot be duplicated or microfilmed by currently available technology."

C. Definitions--A source record is any record submitted to the records system for processing, microfilming, and retention that is the source of the microfilm record copy. A microfilm record copy is the silver-halide microfilm of each issue of a document.

D. Criteria--It is imperative that source records submitted to the records system for microfilming be of the highest possible quality. Microfilming services will be provided by RFP Quality Assurance Records Management (QARMS).

Part 3 -- Practical criteria for acceptability of source records are as follows:

1. Record must be legible; there must be a clear and distinct image with a sharp contrast between the character or pictorial information recorded and the recording medium (paper). Records shall be recorded with an indelible medium, preferably black ink, against a light background. Information recorded on certain records may be accepted in other than indelible ink.

Such uses shall be handled on a case by case basis and approved in advance by the QAPM who will submit the documentation to the Records Custodian for placement with the record.

2. If photocopies are submitted as the record copy, they must be legible. The copy image must be aligned properly; optically skewed images are not acceptable; the angle of the record must be truly reproduced on the photocopy; square corners must appear at right angles.

3. No photo reductions of data are acceptable unless the image is very clear and easily legible. Letters and other characters must be spaced so that the background areas between them are approximately equal. Words shall be clearly separated by space equal to the height of the lettering.

4. If the original records are not available for submittal to the records center, the generation of the copy submitted for processing must be as close to the original as possible and not more than two generations from it (i.e., a copy of a copy of the original). Each copy generation removed from the original is of poorer quality).

5. Avoid using colored paper as a recording medium. The contrast between the data recorded and the color of the paper is not distinct enough to produce a microfilm image of sufficient quality.

6. NCR (no carbon required) paper or other paper requiring pressure from writing implement, typewriter, or printer to produce a legible copy are not acceptable. Only the white first page (original) of an NCR form is acceptable.

NOTE: Oversized records that are of a color that can be filmed on a 35mm planetary camera for aperture card production handling are the only exception to this rule and will be considered on a case-by-case basis. Approval by the responsible manager is required prior to submittal.

7. Data on drawings shall be recorded in black ink. Blackline drawings are preferred to blueline or sepia copies. If blueline or sepia drawings are the only copies available, they must not be folded but rather rolled for storage or transmittal. Store them on stick files or in flat (plan) files. Creasing the paper creates marks that can obscure data recorded on the drawing.

8. Oversized records (i.e., records with the minimum dimension greater than 14 inches) shall be rolled for transmittal in a tube.

9. Records must be complete; no portions of a page can be missing due to tearing or folding of record edges that obliterates recorded information.

10. Records shall be sent unbound or loose-leaf when possible.

APPENDIX 3
BEST AVAILABLE COPY FORM

EGEG ROCKY FLATS
ENVIRONMENTAL MANAGEMENT DEPARTMENT

EMD
Best Available
Copy Justification

INSTRUCTIONS: *Place an* "X" *into each appropriate* ☐ *and/or provide comments which will explain why this is the* "Best Available Copy."

Records Transmittal Number RT – _____

- ☐ A better copy could not be located.
- ☐ The original record was generated outside the Project.
- ☐ The original record was of poor quality.
- ☐ The original could not be located.
- ☐ The original was sent to the addressee.

Additional Comments: _____

Signature of Source _____ Phone No. _____ Date ____/____/____ Div. _____

APPENDIX 4
EM DEPARTMENT SAMPLE RECORD PACKAGE TABLE OF CONTENTS

EGⅈG ROCKY FLATS
ENVIRONMENTAL MANAGEMENT DEPARTMENT

EMD
Record Package
Table of Contents

Record Source Name: _____ Org. Code: _____

Accession No. _____ (Added by EM Records Center)

Final _____ Projected _____

Date: _____

Records Package Number: _____ (Obtain number from EM records center if unavailable.)

Record Date	Record Package Sections (unique identifier, if applicable)	No. of Pages (Not required for Projected Table of Contents)

Approved or Verified By: (Approved for Projected and Verified for Final) _____ Phone No. _____ Date ___/___/___ Div. _____

APPENDIX 5
EM DEPARTMENT RECORD DEFICIENCY FORM

EG&G ROCKY FLATS
ENVIRONMENTAL MANAGEMENT DEPARTMENT

EMD
Record Deficiency
Form

Date ___/___/___

To: _____

From: _____

SUBJECT: RECEIPT INSPECTION OF THE FOLLOWING RECORD: RT - _____

_____

_____

This record has been inspected and was determined deficient for the reason(s) marked below:

- ☐ INCOMPLETE (Pages or Attachments/Enclosures missing)
- ☐ INCOMPLETE DATA AVAILABLE FOR RECORD INDEXING: Record Date - Record Title/Subject Line - Record Receiver Name and Organization - Record Author Name and Organization - EM file number
- ☐ RECORD QUALITY IS POOR AND WILL NOT PROVIDE AN ADEQUATE MICROFILM IMAGE
- ☐ OTHER (Specify): _____

_____

PLEASE TAKE APPROPRIATE ACTION TO CORRECT THE RECORD AND RETURN WITH THIS FORM TO THE RECORDS CUSTODIAN WITHIN 10 WORKING DAYS OF RECEIPT

COMMENT: The Records Custodian is available to assist you in preparing records for processing

RECORD SOURCE REPLY:

Received Date ___/___/___

- ☐ CORRECTED COPY ATTACHED
- ☐ "BEST AVAILABLE COPY" – PROCESS AS IS
- ☐ RECORD REVISED AT RECORD CENTER

_____

Record Source Signature
Completion Date

APPENDIX 6
EM DEPARTMENT RECORDS RETRIEVAL FORM

EG&G ROCKY FLATS
ENVIRONMENTAL MANAGEMENT DEPARTMENT

EMD
Records Retrieval
Form

Date: __/__/__

Requestor: _____

Organization: _____ Phone Request Time: _____

Mailing Address: _____

File Number (if known): _____ Transmittal Number (if known) _____

Originator/Author: _____ Recipient: _____

Date: __/__/__ Report Number: _____

Title: _____

WHAT WAS THE DOCUMENT SUBJECT? _____

_____

_____

_____

_____

POSSIBLE KEYWORDS/IDEAS? _____

_____

_____

_____

Date Required: __/__/__ With Attachments: Yes ___ No ___

Records Custodian (Initials): _____

Time Out: _____ Time In: _____ Number of Copies: _____